Applicant gratefully acknowledges the Examiner's statement that claim 7 is allowable. However, Applicant defers amendment of claim 7 at this time, as noted below in response to the rejections of claims 1-4 and 6. More particularly, Applicant maintains that independent claim 1 should be allowable and, therefore, amendment of claim 7 is unnecessary. Reconsideration and withdrawal of the objection to claim 7 are therefore earnestly requested.

Objection to the Drawing

The drawing was objected to under 37 C.F.R. § 1.83(a). More particularly, the Examiner maintains that the wire rod carried within the tube cavity, as recited in claim 7, must be shown or the feature(s) cancelled from the claim(s). Applicant respectfully disagrees with the objection.

Applicant's specification states: "FIG. 6A is a cross-sectional view ..... illustrating a **wire rod installed in the tube cavity** .... " Specification at page 6, lines 21-25. Referring now to Figure 6A, the wire rod is shown in the original drawing and referred to by reference character 66. Thus, the wire rod carried within the tube cavity feature of Applicant's invention clearly is shown in the drawing at Figure 6A. It is respectfully submitted that the objection to the drawing is thus overcome. reconsideration and withdrawal of the objection to the drawing are therefore earnestly requested.

Rejection under 35 USC § 102

Claims 1, 2 and 4 were rejected under 35 USC § 102(b) as being anticipated by DT 1212356. Applicant respectfully disagrees with the rejection.

Applicant's independent claim 1 recites an apparatus for connecting and sealing duct sections having, *inter alia*, first and second connectors, **each connector** comprising a **tubular member**, and an **annular flange, extending radially outwardly from an outer end of the tubular member**. It is respectfully submitted that DT 1212356 does not disclose the foregoing features of Applicant's claim 1; rather, DT 1212356 discloses an apparatus for connecting and sealing duct sections **without flanges**. See DT 1212356 at column 1, lines 24-33 (Flange connections are heavy and not suitable. A goal of the invention is therefore a connection by which the assembly is facilitated and which combines the advantages of the simplicity and adaptability of the seamed joints with the advantages of the air-tightness of flange connections.)

See also Fig. 1 and reference thereto in the specification of DT 1212356 at column 2, lines 10-11 (Fig. 1 shows the connection of two surface parts **without flanges**).

Furthermore, it is noted that edge strips 3 and 4 are, in fact, **U-shaped in cross-section** (DT 1212356 specification at column 2, line 23), not **tubular**, as recited in Applicant's claim 1. Thus, it is clear that the cited reference lacks at least both the annular flange and the tubular member features of Applicant's claims (as well as numerous other claimed features not argued at this time). It is respectfully submitted that DT 1212356 does not disclose each and every limitation of Applicant's claim 1 and, therefore, the reference cannot anticipate. Reconsideration and withdrawal of the rejection of claim 1 as being anticipated by DT 1212356 are therefore respectfully requested.

Dependent claims 2 and 4, being dependent from and further limiting independent claim 1, should be allowable for the same reasons, as well as for the additional limitations recited therein. Reconsideration and withdrawal of the rejection of claims 1, 2 and 4 as being anticipated by DT 1212356 are respectfully requested.

Claims 1, 2 and 4 were rejected under 35 USC § 102(b) as being anticipated by Hermanson (US 5,983,496). Applicant respectfully disagrees with the rejection.

Applicant's independent claim 1 recites an apparatus for connecting and sealing duct sections having first and second connectors, **each connector comprising**, *inter alia*, a **tubular member**, and an **annular flange**, extending radially outwardly **from an outer end of the tubular member**, and further comprising a **rolled edge**. It is not apparent which structure in Hermanson the Examiner maintains constitutes the "rolled edge" of the first and second connectors (indeed, there appears to be no rolled edge whatsoever disclosed anywhere in the reference). However, the Examiner maintains that the "Mating Flange" 4 of Hermanson constitutes "first and second connectors" and that the "Insertion Flange" 3 of Hermanson constitutes a "tubular member" as recited in Applicant's claim 1. Applicant respectfully disagrees.

Nowhere in Hermanson is the Insertion Flange 3 described as being **tubular**. Further, it is apparent from the specification and drawing in Hermanson that Insertion Flange 3 is, in fact,

not a tubular member, rather, it is "secured within the spinning die" (specification at column 2, lines 11-12) and "retain[s] its original cylindrical, collar-shaped configuration" (specification at column 11, lines 4-5). Referring to Figure 4, Flanged Rings 10 are shown, with Insertion Flange 3 of each connector being shown as well. Clearly, Insertion Flange 3 is not shown as being "tubular" and, in fact, as it is shown in Figure 1A, it is quite apparent that Insertion Flange 3 is a **flat strip** of metal, not a tubular member, as the Examiner suggests. This is further shown in Figures 2 and 4, which clearly show Hem 5 and Return Flange 6 as being flat, not tubular. Indeed, the specification states that Hem 5 and Return Flange 6 are formed by folding (see, *e.g.*, Hermanson claims 2, 19 and specification at column 10, lines 20-22: "causing the metal to fold back onto and in contact with Hem 5 thus forming the Return Flange 6.").

Furthermore, the Examiner has not identified any structure in the reference that is alleged to constitute a "rolled edge," as recited in Applicant's claim 1. Indeed , there appears to be no disclosure of a connector having a "rolled edge" anywhere in Hermanson.

Thus, it is respectfully submitted that Hermanson lacks at least both the tubular member and rolled edge features of Applicant's claims (as well as numerous other claimed features not argued at this time) and, therefore, the claims cannot be anticipated by the reference. Reconsideration and withdrawal of the anticipation rejection of claim 1 are earnestly requested.

Dependent claims 2 and 4, being dependent from and further limiting independent claim 1, should be allowable for the same reasons, as well as for the additional limitations recited therein. Reconsideration and withdrawal of the rejection of claims 1, 2 and 4 as being anticipated by Hermanson are respectfully requested.

Rejections under 35 U.S.C. § 103

Claims 3 was rejected under 35 U.S.C. 103(a) as being unpatentable over DT 1212356 in view of Janakirama-Rao.

Applicant respectfully disagrees, and believes the claims are patentable over DT 1212356 in view of Janakirama-Rao, individually and in combination, for the reasons given above in respect to the section 102 rejection of claim 1 (from which claim 3 depends). The arguments above as to the novelty of claim 1 are repeated here by reference. As explained above, DT

1212356 lacks multiple features of Applicant's claim 1. Furthermore, Janakirama-Rao does not cure the deficiencies of DT 1212356 (note that Janakirama-Rao was cited expressly to show the duct sealer feature). At best, the combination of DT 1212356 and Janakirama-Rao would result in an apparatus for connecting and sealing duct sections (or rocket shell sections) with duct sealer and **without flanges**, which does not teach or suggest an apparatus for connecting and sealing duct sections having first and second connectors, **each connector** comprising a **tubular member**, and an **annular flange, extending radially outwardly from an outer end of the tubular member**, as recited in Applicant's independent claim 1. It is respectfully submitted that the rejection is thus overcome.

Dependent claim 3, being dependent from and further limiting independent claim 1, should be allowable for the same reasons, as well as for the additional limitations recited therein. Reconsideration and withdrawal of the rejection of claim 3 as being obvious over DT 1212356 in view of Janakirama-Rao are respectfully requested.

Claims 3 was rejected under 35 U.S.C. 103(a) as being unpatentable over Hermanson in view of Janakirama-Rao.

Applicant respectfully disagrees, and believes the claims are patentable over Hermanson in view of Janakirama-Rao, individually and in combination, for the reasons given above in respect to the section 102 rejection of claim 1 (from which claim 3 depends). The arguments above as to the novelty of claim 1 are repeated here by reference. As explained above, Hermanson lacks multiple features of Applicant's claim 1. Furthermore, Janakirama-Rao does not cure the deficiencies of Hermanson (note that Janakirama-Rao was cited expressly to show the duct sealer feature). That is, neither reference, whether alone or in combination, teaches or suggests the tubular member or rolled edge features of Applicant's claim 1. Thus, the combination of Hermanson and Janakirama-Rao does not teach or suggest an apparatus for connecting and sealing duct sections, **each connector comprising**, *inter alia*, a **tubular member**, and an **annular flange**, extending radially outwardly **from an outer end of the tubular member**, and further comprising a **rolled edge**, as recited in Applicant's independent claim 1. It is respectfully submitted that the rejection is thus overcome.

Dependent claim 3, being dependent from and further limiting independent claim 1, should be allowable for the same reasons, as well as for the additional limitations recited therein. Reconsideration and withdrawal of the rejection of claim 3 as being obvious over Hermanson in view of Janakirama-Rao are respectfully requested.

Claim 6 was rejected under 35 U.S.C. 103(a) as being unpatentable over Hermanson in view of Davis (US 5,016,925).

Applicant respectfully disagrees, and believes the claims are patentable over Hermanson in view of Davis, individually and in combination, for the reasons given above in respect to the section 102 rejection of claim 1, from which claim 6 depends. The arguments above as to the novelty of claim 1 are repeated here by reference.

Furthermore, Davis does not cure the deficiencies of Hermanson (note that Davis was cited expressly to show the O-ring channel feature). More particularly, the combination of Hermanson and Davis does not teach or suggest an apparatus for connecting and sealing duct sections, **each connector comprising**, *inter alia*, a **tubular member**, and an **annular flange**, extending radially outwardly **from an outer end of the tubular member**, and further comprising a **rolled edge**, as recited in Applicant's independent claim 1. It is respectfully submitted that the rejection is thus overcome.

Dependent claim 6, being dependent from and further limiting independent claim 1, should be allowable for the same reasons, as well as for the additional limitations recited therein. Reconsideration and withdrawal of the rejection of claim 6 as being obvious over Hermanson in view of Davis are respectfully requested.

Conclusion

Applicant believes the claims are patentable over the prior art, and that this case is now in condition for allowance of all claims therein. Such action is thus respectfully requested. If the Examiner disagrees, or believes for any other reason that direct contact with Applicant's attorney would advance the prosecution of the case to finality, he is invited to telephone the undersigned at the number given below.

"Recognizing that Internet communications are not secured, I hereby authorize the PTO to communicate with me concerning any subject matter of this application by electronic mail. I understand that a copy of these communications will be made of record in the application file."

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